

EXHIBIT 4

In re: MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition
Testimony of Keith Martorana and the GUC Trust and New GM's Objections Thereto

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
9:21	11:14	
12:9	13:15	
13:17	14:10	
23:11	23:15	
23:19	23:20	
25:11	25:16	
25:19	25:25	
26:4	27:1	
27:6	27:19	
32:11	33:25	
35:9	35:12	
35:15	36:4	
36:11	36:12	
37:11	38:7	
38:16	38:18	
38:22	39:15	
39:18	43:6	
43:10	43:13	
51:25	52:2	
52:5	53:19	
53:24	54:4	
58:2	60:2	
60:16	61:8	
66:21	67:7	
67:18	68:3	
68:17	69:9	
69:11	69:19	
71:1	72:22	
73:17	73:20	
74:4	74:12	
75:21	76:8	
76:14	77:8	
83:9	83:23	Relevance.
84:16	85:15	Relevance.

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
85:22	86:1	Relevance; Incomplete quotation; Lack of foundation (FRE 602).
86:11	88:4	Relevance (86:11-88:4); Incomplete quotation; Lack of foundation (FRE 602) (86:11-25); Mischaracterizes testimony (88:1-4).
88:8	88:10	Relevance; Lack of foundation (FRE 602); Mischaracterizes testimony.
92:14	92:19	Lack of foundation (FRE 602); Mischaracterizes testimony.
92:24	93:2	Lack of foundation (FRE 602); Mischaracterizes testimony.
103:22	104:1	
104:5	104:6	
106:19	106:25	
107:4	107:10	
107:18	107:22	
108:1	108:6	
109:15	109:24	
110:6	110:8	Lack of foundation (FRE 602); Mischaracterizes testimony; designation is incomplete (it begins half-way through the witness' answer).
111:14	112:14	Attorney colloquy; Lack of foundation (FRE 602) (112:12-14).
112:16	112:19	Attorney colloquy; Lack of foundation (FRE 602).
112:23	113:25	Mischaracterizes testimony (113:19- 25).
114:5	114:10	
115:15	116:9	
116:13	116:14	
116:17	116:21	
118:7	118:13	
123:23	124:7	
125:17	125:20	
125:25	125:25	
126:13	126:16	
126:20	128:10	

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
128:14	129:2	
129:6	129:25	
130:5	130:23	
131:19	132:7	Lack of foundation (FRE 602); Mischaracterizes testimony (132:3-7).
132:10	132:20	Lack of foundation (FRE 602); Mischaracterizes testimony.
133:12	133:15	
134:20	135:25	
141:22	142:7	
148:25	149:12	
149:15	149:18	
155:7	155:11	
176:17	178:6	
178:20	179:23	
183:23	183:25	
184:4	184:19	
184:23	184:23	
194:14	196:1	Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (195:23-196:1).
196:9	197:8	Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (196:9-12).
197:11	197:19	
200:21	200:22	
204:5	204:6	
216:8	216:9	
235:14	235:22	
236:1	236:23	

GUC Trust and New GM's Counter Designations of the Deposition Testimony of Keith Martorana and the Plaintiffs and Participating Unitholders' Objections Thereto

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
14:12	14:22	
27:21	28:4	This is not a valid counter-designation, as neither completeness or fairness requires that this designation be considered contemporaneously with the designations (FRE 106); Hearsay (801, 802)
35:13	35:14	Improper designation of counsel objection
36:9	36:10	Improper designation of counsel objection
60:3	60:13	
73:21	74:2	
78:12	79:4	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks foundation/ personal knowledge (601, 602); speculation/ vague and ambiguous.
79:15	80:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation / personal knowledge (601, 602); calls for speculation.
80:25	81:13	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (FRE 106); lacks foundation/ personal knowledge (FRE 601, 602).

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
88:11	88:16	Hearsay (801, 802); lacks foundation/ personal knowledge and is vague and ambiguous ("we did not feel it was appropriate...")
92:21	92:23	Improper designation of counsel objection
93:3	93:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); hearsay (801, 802)
93:13	93:18	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
93:21	94:16	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
108:8	108:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106).
108:15	109:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); improper opinion (701, 702); hearsay (801, 802); vague and ambiguous; more prejudicial than probative/ waste of time (401-403).
110:3	110:5	
129:4	129:5	Improper designation of counsel objection
130:1	130:2	Improper designation of counsel objection
132:8	132:9	Improper designation of counsel objection

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
149:13	149:14	Improper designation of counsel objection
154:1	155:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106)
184:25	185:11	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.
185:15	185:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.
186:2	186:8	Not a valid counter-designation and is moreover incomplete on its own because it omits the answer to the question (106); even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation (601, 602); calls for speculation.
186:11	186:20	Not a valid counter-designation and is moreover incomplete on its own and out of context (106); includes improper record objections; 401-403 (more prejudicial than probative/confusion of the issues/ waste of time); calls for speculation; lacks foundation/ personal knowledge (601, 602).
200:6	200:20	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106).
200:23	201:25	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
		contemporaneously with the designated content (106); 801, 802, 701, 702, Lacks foundation (601, 602)
202:12	203:3	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); hearsay
203:8	203:18	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); further, it is in and of itself incomplete, as it omits the answer to the designated question on line 19 (106).
203:20	204:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); improper opinion (701, 702).
204:7	204:23	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); improper opinion (701, 702)
206:19	207:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); lacks foundation / personal knowledge (601, 602).

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
208:7	208:12	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); 601, 602, calls for speculation.
211:22	212:15	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were “complete” by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation/ personal knowledge (601, 602); speculation/ vague and ambiguous.
214:10	215:9	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
216:1	216:7	This is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks foundation (601, 602).